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August 22, 2002

DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

Mr. Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

94-102

RE: Unintentional 911 Calls from Mobile Phones

Dear Mr. Sugrue:

This letter is in response to your letter to Voicestream Wireless Corporation of August 6, 2002 requesting information on steps VoiceStream has taken or plans on taking, to reduce or eliminate unintentional 911 calls. VoiceStream shares the concerns expressed by the Commission and by public safety regarding the impact of unintentional 911 calls on wireless 911 networks, and the need for all parties involved to take steps to mitigate the number of such calls. As described below, VoiceStream has and will continue to take steps to do so.

On December 12, 2001, the National Emergency Numbering Association ("NENA") sent a letter to a number of wireless carriers, including VoiceStream, requesting information on what each company has done, or was willing to do, to reduce or eliminate unintentional 911 calls. Your letter of August 6 suggests that VoiceStream did not respond to NENA's request; in fact, VoiceStream did respond to NENA on March 19, 2002. This fact is reflected on NENA's website at [http://www.nena.org/Wireless911/unintentional\\_wireless.htm](http://www.nena.org/Wireless911/unintentional_wireless.htm). We have attached a copy of our response letter for your reference.

In our March 19 letter to NENA, VoiceStream stated that all of our handsets come from the manufacturer with no 911 speed dialing enabled. VoiceStream also stated that it is working with CTIA to develop an industry-wide customer awareness program.

Your August 6 letter requests VoiceStream to respond with information regarding:

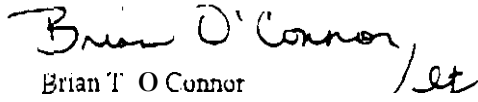
- 1) whether VoiceStream has communicated to its handset manufacturers its desire that mobile phones not be preprogrammed to dial 911 by pushing a single button on the keypad;
- 2) whether VoiceStream instructs its personnel to deactivate the auto-dial 911 feature if it comes preprogrammed on certain mobile phones;
- 3) the extent to which VoiceStream provides customers with information regarding the unintentional 911 calls problem, both for existing handsets and new handsets; and
- 4) whether VoiceStream itemizes 911 calls on its customers' bills to alert them that they may be placing 911 calls unintentionally.

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As indicated in our March 19 letter to NENA, all of VoiceStream's handsets come from the handset manufacturer with no 911 speed dialing enabled. Accordingly, we have no need to instruct our personnel to deactivate the auto-dial 911 feature since our handsets are not enabled. We are working with our marketing department to modify our "Welcome Guide," which comes with all new activated phones, to address specifically the unintentional 911 calls issue and to encourage customers to learn to use the 'key lock' feature of their phone. We also are requesting that our handset vendors modify the handset manuals to include similar information. Additionally, we will be putting a message directly on customers' bills and also providing bill inserts specifically addressing the issue of unintentional 911 calling. Finally, VoiceStream does currently provide 911 call details on post-paid customers' bills, which should allow them to ascertain whether they are dialing 911 unintentionally from the handsets.

If you have any further questions regarding VoiceStream's efforts to minimize or eliminate unintentional 911 calls, please contact Jim Nixon or Bob Calaff on 202-654-5900.

Sincerely,

  
Brian T. O'Connor  
Vice President  
Legislative and Regulatory Affairs

Enclosure



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DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

March 19, 2002

Roger Hixson  
NENA Technical Issues Director  
422 Beecher Rd.  
Columbus, Ohio 43230

94-102

Dear Roger:

I would like to take this opportunity to respond to your letter dated December 12, 2001 to Mr. John Stanton, CEO of VoiceStream Wireless. In your letter, you addressed the problem of unintentionally dialed 911 calls and asked for VoiceStream's position on the issue.

VoiceStream shares NENA's concern regarding the problem of unintentionally dialed 911 calls, and is taking steps to address the situation. All of VoiceStream's handsets come from the manufacturer with no 911 speed dialing capability enabled. Like all wireless consumers, however, VoiceStream's customers can program a number— including 911 — for speed dialing into their handsets. VoiceStream is working with CTIA to develop a program to heighten awareness and minimize the risk of unintentional 911 dialing by consumers.

Please let me know if I can be of further assistance.

Sincerely,

Jim Nixon  
Director, Governmental Affairs  
202-654-5911  
jim.nixon@voicestream.com

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401 9th Street, NW, Suite 550 Washington, DC 20004

October 23, 2002

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DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

Thomas J. Sugrue  
Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Unintentional "911" Calls Made From Mobile Phones

94-102

Dear Mr. Sugrue:

On behalf of the Cellular Telecommunications & Internet Association, I am writing to inform you of new requirements adopted by the wireless industry to reduce the incidence of unintentional "911" calls made to public safety agencies from wireless phones. As you are aware, many wireless carriers, including AT&T Wireless, T-Mobile (formerly "Voicestream") and Verizon, already have taken concrete steps to ensure that wireless handsets are not preprogrammed to dial "911" by pushing a single button on the keypad.<sup>1</sup> Building on these activities, CTIA has now expanded the scope of these voluntary industry efforts.

CTIA recognizes that the number of unintentional calls to 911 triggered by wireless handsets' "one-touch" dialing feature is an important public safety issue, but that many consumers (and consumer groups) value the one-touch dialing feature."

<sup>1</sup> See Letter from Douglas I. Brandon, Vice President, External Affairs & Law, AT&T Wireless to Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau (dated Aug. 21, 2002) (noting AT&T Wireless efforts to minimize unintentional E911 calls); Letter from Brian T. O'Connor, Vice President, Legislative and Regulatory Affairs, Voicestream to Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau (dated Aug. 22, 2002) (noting Voicestream efforts to minimize unintentional E911 calls); Letter from John T. Scott, III, Vice President & Deputy General Counsel, Regulatory Law, Verizon Wireless to Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau (dated Aug. 21, 2002) (noting Verizon Wireless efforts to minimize unintentional E911 calls).

See Consumer Reports, February, 2002, at 18No. of Copies rec'd 1  
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Thomas J. Sugrue  
October 23, 2002  
Page 2

Accordingly, in an effort to reduce the incidence of unintended "911" calls, while **preserving** consumer choice, CTIA's Board of Directors recently modified the CTIA Certification Program<sup>3</sup> to include a requirement, effective January 1, 2003, that CTIA Certified handsets will not be pre-programmed with "911" as a factory-set (i.e., default) one-touch dialing feature. Individual consumers who value this feature may program "911" as a one-touch number on their handset, but the handset will not be preprogrammed at the factory to dial "911." In addition to adopting this new Certification Program requirement, CTIA's Board of Directors recognized that consumer education is also important.

The addition of this requirement to CTIA's Certification Program demonstrates the wireless industry's commitment to working with the Commission and public safety agencies to reduce unintentional "911" calls. Should you have any further questions regarding CTIA's efforts in this area, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Altschul", with a stylized flourish at the end.

Michael Altschul

---

The CTIA Certification Program is a voluntary program for both suppliers and carriers. It provides impartial evaluation of new wireless industry products, such as handsets, to ensure these products meet established industry performance standards and consumer information requirements.



Douglas L. Brandon  
Vice President -  
External Affairs & Law

Fourth Floor  
1150 Connecticut Avenue NW  
Washington, DC 20036  
Phone 202-223-9222  
Fax 202-223-9095  
Wireless 202-255-5011  
doug.brandon@attws.com

August 21, 2002

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DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

Thomas J. Sugrue  
Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: Unintentional 911 Calls from Mobile Phones**

94-102

Dear Mr. Sugrue:

This letter responds to your inquiry of August 6, 2002 regarding the actions AT&T Wireless Services, Inc. ("AWS") is taking to reduce the number of unintentional calls to 911 that are made by AWS subscribers.<sup>1</sup> AWS appreciates the importance of doing all it can to ensure that the number of unintentional 911 calls from our customers is minimized. Your specific questions are answered below.

Q1) Whether AT&T Wireless has communicated to its handset manufacturers its desire that mobile phones not be preprogrammed to dial 911 by pushing a single button on the keypad?

A1) Yes. AWS has worked with its handset vendors to ensure that all handsets are shipped to AWS with the auto-dial for 911 pre-programmed to "OFF." While AWS cannot prevent a customer from using the speed dial function to preprogram any number into his or her phone, all handsets come from the factory with no emergency numbers preprogrammed.

Q2) Whether AT&T Wireless instructs its personnel to deactivate the auto-dial 911 feature if it comes preprogrammed on certain mobile phones?

A2) The auto-dial 911 feature does not come preprogrammed on any AWS handset

<sup>1</sup> AWS responded to a similar inquiry from the Wireless Telecommunications Bureau via email on February 19, 2002.

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Q3) The extent to which AT&T Wireless provides customers with information regarding the unintentional 911 calls problem, both for existing handsets and new handsets.

A3) AWS' website advises customers "DO NOT enter 9-1-1 into your phone's memory. If certain buttons on your phone are accidentally pressed, you could call 9-1-1 accidentally. This distracts the emergency operator, who is trying to answer real emergency calls. If your phone has a 'one button' emergency feature, make sure it is disabled to avoid accidental calls. Your sales representative can show you how."<sup>2</sup> AWS also devotes a page in its "Welcome Guide" (the instructional booklet included with each handset that advises customers how to activate service and set up voicemail systems) to emergency calling. On that page, customers are advised "Remember: Lock your keypad to prevent unintended calls to 911." In addition, the June 2002, February 2002, and October 2001 issues of Wireless Today, a newsletter distributed to the majority of AWS subscribers, included the following information about preventing accidental 911 calls:

Every year 911 operators receive thousands of "phantom" calls - calls made unintentionally by wireless users. That's because many phones are automatically programmed to call 911 when the 1 or 9 key is held down. A wireless user may accidentally call 911 when a phone is bumped in their purse, briefcase, or pocket. Since every call to 911 requires a call back for verification, phantom calls may potentially prevent real emergency calls from getting through.

To avoid an accidental 911 call, protect your keypad when placing your phone with your personal belongings, or better still, lock your keypad whenever you leave your phone on. You may also refer to your manual to disable the preprogrammed 1 or 9 key."

Q4) Whether AT&T Wireless itemizes 911 calls on its customers' bills to alert them that they may be placing 911 calls unintentionally'!

A4) No. AWS does not include information regarding non-billed calls on its customers' bills. AWS' billing systems currently are not designed to capture non-billed call data.

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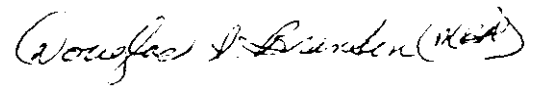
<sup>2</sup> See "Dialing 911: Customer Tips for 9-1-1 from AT&T Wireless"  
<<http://www.attwireless-welcome.com/cs911Free.asp>>.

<sup>3</sup> AWS is in the process of modifying the information in its Welcome Guide and future editions of Wireless Today to reflect the fact that the auto-dial 911 feature does not come preprogrammed on any AWS handset.

**Thomas J.** Sugrue  
Chief, Wireless Telecommunications Bureau  
Page 3

Please do not hesitate to contact me if you need additional information

Sincerely,

A handwritten signature in black ink that reads "Douglas I. Brandon (H&A)". The signature is written in a cursive, flowing style.

Douglas I. Brandon

✓cc: Andra Cunningham, Policy Division, WTB



John T. Scott, III  
Vice President &  
Deputy General Counsel  
Regulatory Law



Verizon Wireless  
1300 I Street N.W.  
Suite 400 West  
Washington DC 20005

Phone 202 589-3760  
Fax 202 589-3750  
john.scott@verizonwireless.com

August 21, 2002

Mr. Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

Re: Unintentional 911 Calls from Mobile Phones

Dear Mr. Sugrue:

94-102

You have asked Verizon Wireless to outline the efforts the company is making to reduce unintentional "911" calls made from wireless phones to public safety agencies. We agree with your assessment that wireless handset vendors, carriers and public safety agencies are working to address this issue. Verizon Wireless has examined the possible causes of the problem and the extent to which it may exist in our network, and we have taken steps to reduce the likelihood of unintentional emergency calls.

We agree that most if not all accidental 911 calls are generated when the "1" or the "9" key on phones designed with a "one-touch emergency 911 dialing" feature is accidentally pressed while the phone is in the user's pocket, purse or briefcase, or is carried on the user's belt. We believe this problem is not widespread among Verizon Wireless' equipment base.

First, Verizon Wireless has not required handset vendors to provide the one-touch emergency 911 dialing feature. Some vendors began including this feature in a few models several years ago, but these models comprise only eight of the 32 models we offer for purchase. Three quarters of the models we offer do not have a one-touch feature.

Second, in January 2002, we verbally contacted all of our vendors that **provided** models with the one-touch feature and requested them to confirm that they ship the handsets to us with the feature ~~deactivated~~. In March 2002, we followed up with a written request to all vendors to ensure that they shipped the handsets with the feature turned off, and all vendors confirmed that they did so, with one exception. This one model, manufactured by Samsung, has a one-touch feature that Samsung advises cannot be disabled. However, because this phone has a "clamshell" design in which the buttons are covered by the top of the clamshell, it is extremely unlikely to generate unintentional calls. In addition, Samsung has advised that it is developing a software change to remove this feature.

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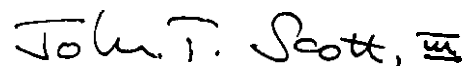
Third, we have decided that we will not offer any new handset model that has the one-touch feature at all. We have thus modified our product specifications so that they prohibit manufacturers from including the one-touch emergency 911 dialing feature in future models. This includes removing the red coloring of the number "9" key on the keypad. This action ensures that future products will not be capable of unintentional calls.

We appreciate NENA's suggestions as to itemizing 911 calls on customers' bills and providing customers with additional information. We are not able to implement the first suggestion given limitations in most of our billing systems that do not include call details of free calls such as 911 calls on customers' bills. Because phones are not provided to customers with an activated one-touch 911 feature, we have not provided general information to all our customers (in addition to information already provided in the user guide as to this optional feature). Given what we believe is an issue for a limited number of handsets, we determined that a broad communication would be confusing to customers. In response to your inquiry, however, we are considering the suggestion that we develop such a communication as well as how the information could be provided.

PSAPs' expanded rollout of E911 Phase I will also help to minimize the problem of unintentional 911 calls. Verizon Wireless now provides Phase I service to nearly 1,500 PSAPs nationwide, representing a significant portion of our service area. We are working to deploy this service in many more communities. With Phase I capability, PSAPs can identify the mobile number of the caller and place a return call, thereby alerting the customer that he or she may have inadvertently dialed 911.

Please let me know if we can provide you with additional information

Sincerely,



John T. Scott, III

cc: Andra Cunningham  
James R. Hobson, Esq.



Luisa L. Lancetti  
Vice President  
Regulatory Affairs - PCS

401 9th Street, NW, Suite 400  
Washington, DC 20004  
Voice 202 585 1923  
Fax 202 585 1892

February 21, 2002

*Via Facsimile (614-933-0911) and U.S. Mail*

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DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

Mr. Roger Hixson  
NENA Technical Issues Director  
National Emergency Number Association  
422 Beecher Road  
Columbus, Ohio 43230

Re: Unintentional 911 Calls from Mobile Handsets

94-102

Dear Mr. Hixson:

This letter responds to your inquiry to Charles Levine of Sprint PCS, dated December 12, 2001. We apologize for the delay in responding, but the letter was not originally routed to the appropriate persons.

At the outset, we want to confirm our commitment to 911 services. Sprint PCS has been a leader in 911 deployment. It was the first wireless carrier to offer a GPS handset, selling over 120,000 such handsets during the fourth quarter of 2001. It ~~was~~ also the first handset-based carrier to deploy an operational Phase II system (Rhode Island in December 2001). Sprint PCS is aggressively working to deploy Phase I and Phase II services across the country.

Sprint PCS also shares public safety's concerns regarding unintentional 911 calls. We agree that public safety personnel should spend time on true emergencies and should not have to determine if the caller intended to call 911 or not.

For this reason, Sprint PCS does not support or encourage the manufacture of mobile phones with pre-programmed 911 buttons. The company has never required the inclusion of a pre-programmed 911 feature in the technical specifications that it provides to its handset vendors, and it will continue this policy. Instead, in the instances that Sprint PCS has sold handset models with this feature, it was because the feature already existed in the model delivered by the manufacturer.

In fact, Sprint PCS only has a small minority of handsets being used by current subscribers that have a pre-programmed 911 button. Less than four percent of our current subscribers use a handset that has a pre-programmed 911 button. In addition, out of the 60 handset models that Sprint PCS has sold during its five years of service, only three models have included a pre-programmed 911 feature.

At present, we have no plans to order additional handsets with a pre-programmed 911 feature. Further, in the event that we were to acquire handsets in the future with this feature included by the manufacturer, we would seek to have the feature turned off before delivery to

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end-users. Sprint PCS also notes that, based on our discussions with vendors, it is under the impression that vendors are already discontinuing this feature because of the problems caused by unintentional calls.

In addition, we note that the Sprint PCS customer bill lists all 911 calls placed from the handset. The presence of the 911 call entry thus alerts a customer if an unintended 911 call has been placed. This notification helps ensure that future unintended calls are prevented. Moreover, many of the handsets Sprint PCS sells are "clamshell" handsets, which require the caller to open the handset in order to use the keypad and make calls. This feature also minimizes the prospect of unintentional 911 calls by subscribers.

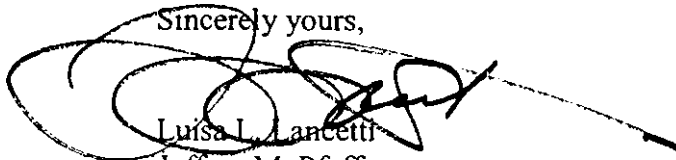
Sprint PCS is considering other educational efforts which may help in this area, such as including additional information with affected handsets at the time of purchase and posting information on its website addressing this issue. We will follow up to see what else can be done.

While we intend to continue our efforts in this area, Sprint PCS believes that the problem of unintentional 911 calls may also be related to the number of 911-only phones being distributed. These handsets are not sold by carriers and usually have only one button programmed to dial 911. As you know, the FCC requires that carriers deliver all 911 calls, regardless of whether it is ~~from~~ an active customer or not. Sprint PCS has no control over these phones but the phones may be posing a problem in this area.

As noted above, Sprint PCS is committed to doing its part to eliminate unintentional 911 calls. Sprint PCS is willing to engage public safety in dialog to resolve this and other issues effecting 911 service. Sprint PCS also urges NENA to sponsor a cooperative effort by all affected parties, including vendors, to address the issue of unintentional 911 calls. Sprint PCS believes such a joint effort would provide a constructive, educational approach with the greatest likelihood of success in resolving this issue.

If you have questions about Sprint PCS' efforts in this area, please contact us.

Sincerely yours,



Luisa L. Lancetti  
Jeffrey M. Pfaff

cc: Charles Levine, President, Sprint PCS  
John Ramsey, Executive Director, Association of Public-Safety Communications Officials-International, Inc.  
Mark Adams, Executive Director, National Emergency Number Association  
Evelyn Bailey, President, National Association of State Nine One One Administrators  
Thomas Sugrue, Chief, Wireless Telecommunications Bureau, FCC  
James Schlichting, Deputy Chief, Wireless Telecommunications Bureau, FCC  
Kris Monteith, Chief, Policy Division, Wireless Telecommunications Bureau, FCC

**Roger**

**From:** Candy.Green@a!ltel.com  
**Sent:** Wednesday, February 13, 2002 6:49 PM  
**To:** roger@nena9-1-1.org  
**Subject:** 9-1-1 Misdialed Calls

**REIVEI**

**Importance:** High

DEC - 6 2002



MISDIALED 9-1-1

CALLS-doc

Roger,

Federal Communications Commission  
Office of the Secretary

Please find attached ALLTEL's response to your letter dated December 12, 2001 addressing the wireless unintentional 9-1-1 call problem you asked the wireless service providers to review and respond to by Feb. 15, 2002.

Thanks,

Candy

94-102

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February 13, 2002

Mr. Roger Hixon  
NENA Technical **Issues** Director  
Dept. 911  
P. O. **Box** 182039  
Columbus, OH 43218

Roger,

I received your letter dated December 12, 2001 addressing the **wireless** unintentional 9-1-1 call problem wherein **you** stated **NENA's** concerns and the profound impact that unintentional 9-1-1 calling is having on America's ability to process legitimate 9-1-1 calls for help. In that letter **you** advised that the PSAPs report from 25% to 70% of wireless calls to 9-1-1 are unintended calls by the wireless subscribers. As a result, the timely processing of legitimate calls for help has been greatly impacted.

ALLTEL Communications, Inc. shares NENA's concerns on this issue and as a result has reviewed the action items **you** asked each carrier to consider. The following is an overview of **ALLTEL's** plan to address this issue in our service areas in an effort to ensure rapid response time to our nation's citizens and ALLTEL customers that need emergency assistance:

- 1) ALLTEL has contacted its handset vendors as requested. Two of our vendors do not have an auto 9-1-1 feature on its handsets and does not pre-populate emergency numbers into any speed-dial location in the phone. With both of these handsets the customer may program emergency numbers into any speed dial location. One vendor has the current phone configuration for 9-1-1 functionality disabled. The customer can enable this configuration by pressing menu 4-1-1. One vendor currently has three models preset with 9-1-1 in the speed dial location #1. The customer can turn this feature off by pressing the appropriate selection on the menu depending on the model of the handset. All future shipments by this vendor will have this feature disabled beginning mid February. Our final vendor's phones are pre-programmed with 9-1-1 in the speed dial and it cannot be changed or disabled. This is not a standard model for ALLTEL. however we may acquire a few with warranty exchanges.
- 2) ALLTEL will issue an Operations Bulletin to its sales channels by March 1, 2002 advising them to disable the auto dial 9-1-1 feature of current inventory stock. They will be instructed to inform the customer that the auto dial 9-1-1 feature is not activated on our handsets unless the customer specifically requests the feature be activated, ALLTEL will also include an informational flyer with the customer's welcome packet.

- 3) ~~Over~~ the next six months ALLTEL will include one bill message an each customer's bill to advise them of this issue and *let* them know how and where they can get their phone's auto dial 9-1-1 feature removed if they would like t o do so.

Sincerely,

Candy Green  
ALLTEL Communications Inc. E911 Corp. Administrator

Roger

From: LONG, PETER J. (SBMS) [peter.j.long@cingular.com]  
Sent: Tuesday, February 12, 2002 1:19 PM  
To: 'roger@nena9-1-1.org'  
cc: Israel, Susan (Cingular); Ashby, Mark (Cingular)  
Subject: FW: unintentional 9-1-1 calls

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Federal Communications Commission  
Office of the SecretaryE911Unintentional  
Dialing\_.doc...

Hello Roger,

Please consider this as Cingular Wireless's reply to NENA's request for information on how we plan to deal with unintentional 911 calling. The file below outlines how the issue may be communicated to our customers. Note that we plan to incorporate the customer care notices and education pieces that are referenced in the documents within the next couple months. At this time, a target date is May 1st. That information may not be available at our Customer Service number nor at our web site until then.

thanks

&gt; &lt;&lt;E911Unintentional Dialing-.doc&gt;&gt;

94-102

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## **CINGULAR WIRELESS**

### **Efforts To Reduce/Eliminate Unintentional 9-1-1 Calls 1/31/02**

1. Cingular contacted its manufacturers in January 2001 and requested that handsets no longer be preprogrammed to reach 9-1-1 by dialing one key on the keypad.
2. Current Cingular equipment inventories no longer contain preprogrammed handsets at retail locations.
3. Proposed Cingular customer education/notification effort:
  - A. Include on (or in) customer bills beginning March 1, 2002 an explanation of unintentional 9-1-1 dialing and reference to Cingular's website at [www.cingular.com](http://www.cingular.com) for detailed information on whom to contact to disable the preprogrammed feature.
  - B. Add to Cingular's website an explanation and other information contained in item A (above) regarding unintentional 9-1-1 dialing.
4. Proposed Network Operations effort

When contacted by public safety agencies about repeated accidental 9-1-1 calls, network operations personnel will attempt to retrieve the calling party's caller identification number (when possible, and in accordance with compliance guidelines), for future customer contact by customer care.

#### **5. Proposed Public Safety notification**

Public Safety Association leaders will be notified of these and other efforts by Cingular to reduce and eliminate unintentional 9-1-1 calls.

**Proposed customer bill tagline or bill insert (this information may also be used for website):**

“Public Safety Organizations have brought to our attention a serious problem for the wireless telecommunications industry and 9-1-1. Many wireless phones purchased prior to 2001 may be preprogrammed to dial 9-1-1 by pressing one key on a telephone keypad. The feature, intended for convenience, is creating problems for the Public Safety community. Wireless customers who carry phones in purses or pockets may accidentally press the shortcut key and initiate calls to 9-1-1. In some cases Public Safety organizations are being overwhelmed with these “unintentional” 9-1-1 calls. Obviously, this poses a threat to the timely processing of legitimate calls for help. For information on how to determine if your wireless phone has the preprogrammed feature and/or to disable the 9-1-1 preprogram feature, contact Cingular at 1-866 CINGULAR, or dial \*611 from your mobile phone, or look for this 9-1-1 information on the web at [uuwcingular.com](http://uuwcingular.com).

**NEXTEL**

February 6, 2002

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94-102

Mr. Roger Hixson  
NENA Technical Issues Director  
National Emergency Number Association  
422 Beecher Road  
Columbus, OH 43230

DEC - 6 2002

**Federal Communications Commission  
Office of the Secretary**

RE: Nextel Communications, Inc. Efforts to Mitigate Accidental 911 Calls

Dear Mr. Hixson:

Nextel Communications, Inc. ("Nextel") appreciates the opportunity to provide the National Emergency Number Association ("NENA") with this report on Nextel's efforts to mitigate the incidence of accidental 911 calls by Nextel subscribers. Nextel understands the importance of this issue and took decisive action over a year ago to lessen the possibility that a Nextel user would inadvertently dial 911 from his or her Nextel handset. Additionally, Nextel has engaged in customer (and employee) education campaigns to raise awareness and provide constructive advice on how each individual user can pro-actively reduce his or her chances of unknowingly dialing 911, and Nextel is rolling out a new billing system feature that details each 911 call made by the subscriber during the relevant billing cycle.

Background

Prior to December 2000, all Nextel handsets were manufactured and distributed pre-programmed with a "Turbo Dial" 911 feature that allowed the user to dial 911 simply by depressing and holding the "9" key. Without the need to press the "Send" button, a user could immediately contact a Public Safety Answering Point ("PSAP") with the push of a single button - the 9 key. Well-intended as a feature to enhance the wireless user's safety, Turbo Dial 911 instead resulted in an unanticipated problem for PSAPs as callers accidentally depressed the 9 key, calling 911, while carrying the phone in a purse, in a briefcase or attached to the subscriber's belt. As you explain in your December 12, 2001 letter to wireless carriers, PSAPs receiving these unintentional calls are required to answer them, attempt to talk with the caller (who often does not realize the PSAP is on the line), and call back the 911 caller to ascertain whether or not it is a real emergency.

### Nextel's Efforts to Reduce Accidental 911 Calls

Recognizing that the time spent answering and handling these unintentional calls consumes valuable public safety resources. Nextel and its sole handset manufacturer, Motorola, implemented technology changes that could mitigate the incidence of unintentional 911 calls. Specifically, Motorola and Nextel updated the software in Nextel's handsets to eliminate the Turbo Dial 911 feature.<sup>1</sup> As of December 2000, the Turbo Dial 911 feature was no longer included in any new handset sold by Nextel (and its direct and indirect dealers). To mitigate the potential for accidental 911 calls among existing Nextel subscribers at that time, Nextel offered a free software upgrade to any customer bringing his or her phone in for service.<sup>2</sup> The new software then eliminated the Turbo Dial 911 feature from the legacy handset. Nextel also requested, via a company-wide all-employee email bulletin, that all employees using pre-December 2000 "plus" series handsets have their handsets reflashed with the new software:<sup>3</sup>

In addition to this technological response to the accidental 911 issue, Nextel implemented customer and employee educational campaigns -- explaining the problem in bill inserts, providing a discussion of the issue and solutions in customer and employee newsletters, participating in local industry-wide awareness campaigns and training Nextel sales personnel to address the issue with customers and potential customers. Nextel has attached hereto a copy of the December 2000 bill insert included in all customers' bills and its Winter 2001 and Fall 2001 Customer Newsletters, each of which provides valuable information about the accidental 911 issue.

Specifically, Nextel took the following internal steps in 2000 to decrease the likelihood of accidental calls by its customers:

- (a) distributed a marketing bulletin to all Nextel service centers and Authorized Nextel Representatives, informing them of the accidental 911 issue, and providing information for them to use in educating customers on how to prevent unintended 911 calls (including use of keypad lock on mobile units so equipped);
- (b) trained (on an ongoing basis) the Nextel sales force on how to avoid accidental 911 calling, thus heightening sensitivity to the issue and providing

---

<sup>1</sup> Although Nextel and Motorola no longer ship handsets with the Turbo Dial 911 feature, customers can program their handsets for a Turbo ~~Dial~~ 911 feature, using any of the keys 1 through 9

<sup>2</sup> The software upgrade is applicable to Nextel's "plus" series handsets. Certain Nextel handsets manufactured before July 1999 cannot be upgraded to eliminate the feature.

<sup>3</sup> Clamshell handsets, i.e., handsets with a flip that closes and covers the keys while in a purse or briefcase, rarely make accidental calls and therefore were not included in the employee request

Mr. Roger Hixon

February 6, 2002

Page 3 of 3

them the information necessary to educate customers about the issue and how to avoid it (including the use of keypad lock on mobile units so equipped):

(c) raised awareness of the issue by providing information to all Nextel employees via Nextel's employee newsletter in July 2000, via a Nextel-wide email in the Fourth Quarter 2000 and via postings on Nextel's customer care organization web site and Nextel's company-wide internal "bulletin board" on the Internet; and

(d) included information on Nextel's internal Service and Repair Bulletin.

Additionally, Nextel has educated its nationwide customer base by:

(a) including a discussion of the issue in customer newsletters:

(b) including an informational bill insert in all customer bills; and


(c) establishing a customer/public safety escalation process within Nextel's markets to rapidly and properly address questions and concerns about accidental 911 calls.

More recently, Nextel's billing system was upgraded to include all 911 calls in each customer's call detail records. While not charging the customer airtime for 911 calls, this mechanism highlights for the customer the number of 911 calls he or she made in a month, potentially including some 911 calls the user was unaware he or she had made. By highlighting each individual call, Nextel expects to further raise the awareness of individual customers making 911 calls.

Finally, Nextel reiterates herein its commitment to work with the public safety community and individual Public Safety Answering Points ("PSAPs") when PSAPs identify a large number of 911 calls they believe to be made by a Nextel subscriber. By identifying these subscribers, Nextel may have the ability to further reduce the incidence of accidental 911 calls.

If you have any questions about Nextel's efforts to reduce accidental 911 calls by Nextel subscribers, please do not hesitate to contact me at 703-433-4143.

Sincerely,

  
Laura L. Holloway  
Senior Director - Government Affairs

## FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

August 6, 2002

Brian T. O'Connor  
 Vice President  
 Legislative & Regulatory Affairs  
 VoiceStream Wireless  
 401 9th Street, NW  
 Suite 550  
 Washington, DC 20004

**RECEIVED**

IN REPLY REFER TO

DEC - 6 2002

Federal Communications Commission  
 Office of the Secretary

94-102

RE: Unintentional 911 Calls from Mobile Phones

Dear Mr. O'Connor:

The Wireless Telecommunications Bureau has been actively following the issue of unintentional mobile wireless telephone calls to 911. These "unintentional 911 calls" can occur when a pre-programmed auto-dial 911 key on a mobile phone is accidentally pressed while the phone is in the user's pocket, purse, or briefcase, or is carried on the user's belt. Due to the burden on public safety organizations in responding to unintentional 911 calls, we are contacting selected mobile wireless service providers to assess what actions these companies have taken and are taking to reduce this problem.

As background, when an unintentional 911 call is placed, the general practice of the Public Service Answering Point (PSAP) operator is to remain on the line in an attempt to determine if the call is intentional or unintentional. If the PSAP has E911 Phase II capability, which provides the PSAP with the location of the caller, operators even may be compelled to dispatch emergency services to the caller's location if the PSAP cannot determine that the 911 call has been made unintentionally. The National Emergency Numbering Association (NENA) estimates that a high percentage of wireless 911 calls are unintentional. These unintentional calls result in the diversion of PSAP personnel and resources from the intake of other 911 calls reporting real emergencies. Although pre-programmed 911 keys were initially considered to be a useful public safety feature for wireless phones, the number of unintentional calls and the burden they place on PSAP officials suggests that more harm than good has been brought about by this feature.

Information gathered by the Wireless Telecommunications Bureau suggests that the majority of wireless handset manufacturers, wireless carriers, and public safety agencies are interested in working together to reduce the number of unintentional 911 calls made to PSAPs. A concerted effort among all interested parties is needed for an adequate resolution of this problem. On December 12, 2001, for example, NENA sent a letter to a number of wireless carriers, requesting information on what each company had done, or was willing to do, to reduce or eliminate unintentional 911 calls. In its letter, NENA suggested several solutions that give carriers an opportunity to work cooperatively with the public safety community to try to resolve this problem.<sup>1</sup> We support NENA's efforts to address the unintentional calls problem and would urge that all wireless carriers, to the extent they have not done so already, take steps to eliminate the problem.

We note that VoiceStream is a carrier that has not responded to NENA or provided specific

<sup>1</sup> See Letter to Wireless Carriers, dated December 12, 2001, filed by the National Emergency Number Association at 1. The letter is available in PDF format via the following website link: <http://www.nena9-1-1.org/Wireless911/index.htm>

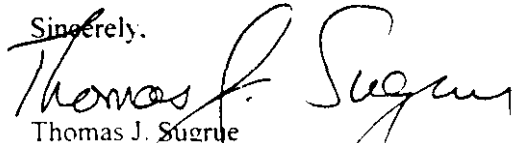
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information on what steps, if any, it is taking to address this issue. Consequently, we specifically request that VoiceStream respond to the Wireless Telecommunications Bureau within 15 calendar days from the receipt of this letter regarding what steps it has taken or plans on taking, to reduce or eliminate unintentional 911 calls. As part of doing so, we ask that Voice Stream address, specifically, the suggestions NENA set forth in its December 12, 2001, letter. Therefore, we seek information on:

- 1) whether Voicestream has communicated to its handset manufacturers its desire that mobile phones not be preprogrammed to dial 911 by pushing a single button on the keypad;
- 2) whether VoiceStream instructs its personnel to deactivate the auto-dial 911 feature if it comes preprogrammed on certain mobile phones;
- 3) the extent to which Voicestream provides customers with information regarding the unintentional 911 calls problem, both for existing handsets and new handsets; and
- 4) whether Voicestream itemizes 911 calls on its customers' bills to alert them that they may be placing 911 calls unintentionally.

Of course you are welcome to provide any additional information regarding your company's efforts to deal with unintentional 911 calls.

We thank you for your time and attention in responding to this inquiry and in addressing this important matter. If there are further questions regarding this information request, please contact Andra Cunningham, Policy Division, Wireless Telecommunications Bureau, at 202-418-1630.

Sincerely,  
  
Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission

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**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, D.C. 20554**

August 6, 2002

IN REPLY REFER TO

Douglas I. Brandon  
Vice President  
External Affairs & Law  
AT&T Wireless  
Fourth Floor  
1150 Connecticut Avenue, NW  
Washington, DC 20036

**RECEIVED**

DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

94-102

RE: Unintentional 911 Calls from hlobile Phones

Dear Mr. Brandon:

The Wireless Telecommunications Bureau has been actively following the issue of unintentional mobile wireless telephone calls to 911. These "unintentional 911 calls" can occur when a pre-programmed auto-dial 911 key on a mobile phone is accidentally pressed while the phone is in the user's pocket, purse, or briefcase, or is carried on the user's belt. Due to the burden on public safety organizations in responding to unintentional 911 calls, we are contacting selected mobile wireless service providers to assess what actions these companies have taken and are taking to reduce this problem.

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Information gathered by the Wireless Telecommunications Bureau suggests that the majority of wireless handset manufacturers, wireless carriers, and public safety agencies are interested in working together to reduce the number of unintentional 911 calls made to PSAPs. A concerted effort among all interested parties is needed for an adequate resolution of this problem. On December 12, 2001, for example, NENA sent a letter to a number of wireless carriers, requesting information on what each company had done, or was willing to do, to reduce or eliminate unintentional 911 calls. In its letter, NENA suggested several solutions that give carriers an opportunity to work cooperatively with the public safety community to try to resolve this problem.<sup>1</sup> We support NENA's efforts to address the unintentional calls problem and would urge that all wireless carriers, to the extent they have not done so

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<sup>1</sup> See Letter to Wireless Carriers, dated December 12, 2001, filed by the National Emergency Number Association at 1. The letter is available in PDF format via the following website link:  
<http://www.nena9-1-1.org/Wireless911/index.htm>.

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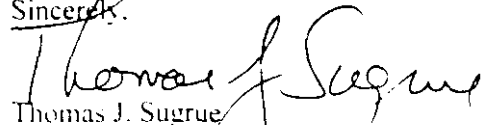
We note that AT&T Wireless is a carrier that has not responded to NENA or provided specific information on what steps, if any, it is taking to address this issue. Consequently, we specifically request that AT&T Wireless respond to the Wireless Telecommunications Bureau within 15 calendar days from the receipt of this letter regarding what steps it has taken or plans on taking, to reduce or eliminate unintentional 911 calls. As part of doing so, we ask that AT&T Wireless address, specifically, the suggestions NENA set forth in its December 12, 2001, letter. Therefore, we seek information on,

- 1) whether AT&T Wireless has communicated to its handset manufacturers its desire that mobile phones not be preprogrammed to dial 911 by pushing a single button on the keypad;
- 2) whether AT&T Wireless instructs its personnel to deactivate the auto-dial 911 feature if it comes preprogrammed on certain mobile phones;
- 3) the extent to which AT&T Wireless provides customers with information regarding the unintentional 911 calls problem, both for existing handsets and new handsets; and
- 3) whether AT&T Wireless itemizes 911 calls on its customers' bills to alert them that they may be placing 911 calls unintentionally.

Of course you are welcome to provide any additional information regarding your company's efforts to deal with unintentional 911 calls.

We thank you for your time and attention in responding to this inquiry and in addressing this important matter. If there are further questions regarding this information request, please contact Andra Cunningham, Policy Division, Wireless Telecommunications Bureau, at 202-418-1630.

Sincerely,



Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission

August 6, 2002  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

DOCKET FILE COPY ORIGINAL

John T. Scott, III  
Vice President and Deputy General Counsel  
Regulatory Law  
Verizon Wireless  
13001 Street, N.W.  
Suite 400 West  
Washington, DC 20005

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IN REPLY REFER TO

DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

94-102

**RE:** Unintentional 911 Calls from Mobile Phones

Dear Mr. Scott:

The Wireless Telecommunications Bureau has been actively following the issue of unintentional mobile wireless telephone calls to 911. These "unintentional 911 calls" can occur when a pre-programmed auto-dial 911 key on a mobile phone is accidentally pressed while the phone is in the user's pocket, purse, or briefcase, or is carried on the user's belt. Due to the burden on public safety organizations in responding to unintentional 911 calls, we are contacting selected mobile wireless service providers to assess what actions these companies have taken and are taking to reduce this problem.

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We note that Verizon Wireless is a carrier that has not responded to NENA or provided specific information on what steps, if any, it is taking to address this issue. Consequently, we specifically request that Verizon Wireless respond to the Wireless Telecommunications Bureau within 15 calendar days from

<sup>1</sup> See Lenerto Wireless Carriers, dated December 12, 2001, filed by the National Emergency Number Association at 1. The letter is available in PDF format via the following website link:  
<http://www.nena9-1-1.org/Wireless911/index.htm>

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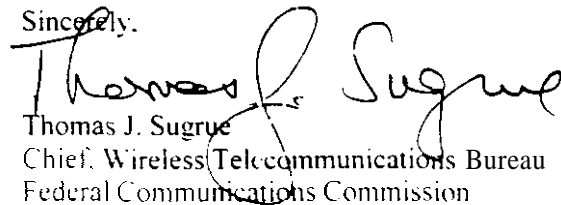
the receipt of this letter regarding what steps it has taken or plans on taking, to reduce or eliminate unintentional 911 calls. **As** part of doing so, we ask that Verizon Wireless address, specifically, the suggestions **NENA** set forth in its December 12, 2001, letter. Therefore, we seek information on:

- 1) whether Verizon Wireless has communicated to its handset manufacturers its desire that mobile phones not be preprogrammed to dial 911 by pushing a single button on the keypad;
- 2) whether Verizon Wireless instructs its personnel to deactivate the auto-dial 911 feature if it comes preprogrammed on certain mobile phones;
- 3) the extent to which Verizon Wireless provides customers with information regarding the unintentional 911 calls problem, both for existing handsets and new handsets; and
- 4) whether Verizon Wireless itemizes 911 calls on its customers' bills to alert them that they may be placing 911 calls unintentionally.

Of course you are welcome to provide any additional information regarding your company's efforts to deal with unintentional 911 calls.

We thank you for your time and attention in responding to this inquiry and in addressing this important matter. If there are further questions regarding this information request, please contact Andra Cunningham, Policy Division, Wireless Telecommunications Bureau, at 202-418-1630.

Sincerely,

  
Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission

**ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS-  
INTERNATIONAL, INC.  
NATIONAL EMERGENCY NUMBER ASSOCIATION  
NATIONAL ASSOCIATION OF NINE ONE ONE ADMINISTRATORS**

January 9, 2002

The Honorable Michael Powell  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20005

**RECEIVED**

DEC - 6 2002

Federal Communications Commission  
Office of the Secretary

Dear Chairman Powell:

We are writing to request that the Commission adopt a Notice of Inquiry as soon as possible to examine the very serious problems posed by unintentional wireless telephone calls to 9-1-1, which are clogging many Public Safety Answering Points ("PSAPs") and diverting scarce resources necessary to respond to real emergencies. We believe that the Commission, wireless carriers, handset manufacturers, PSAPs and subscribers must give immediate attention to this matter. Although we understand that technical personnel in the Wireless Telecommunications Bureau and perhaps other Commission bureaus or offices have been looking into this matter, we strongly recommend that the investigation take the more formal and comprehensive approach that a Notice of Inquiry would permit.

Unintentional wireless calls to 9-1-1 occur most often when a handset button set up for speed-dialing to 9-1-1 is pressed accidentally, often without the knowledge of the subscriber. This can occur, for example, when a pocket phone is pressed against a chair, sat upon, or compressed in a purse or brief case. When such a 9-1-1 call is generated, the PSAP call-taker receiving the call often cannot determine whether the call is real or accidental, and must stay on the line for a period of time, tying up scarce PSAP resources. While a call-back number may be available in some instances (where at least Phase 1 of the E9-1-1 rules has been implemented), making that call and verifying that there is no emergency further diverts personnel and resources.

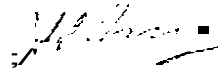
Many wireless handsets were previously distributed to customers with a "one-digit speed-dial" pre-selected for "9-1-1," and some handsets are and continue to be distributed with a designated "9-1-1" button. We understand that many vendors and carriers have discontinued these practices and products on a going-forward basis. However, we remain concerned that some vendors and manufacturers have not made these necessary changes. Moreover, the problem of unintentional calls to 9-1-1 will persist so long as older handsets remain in use and consumers fail to take preventive steps, such as disengaging one-digit speed dialing of 9-1-1 and/or using the keypad locking function available on many handsets.

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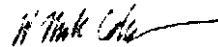
Therefore, we recommend that the Commission initiate an inquiry to gauge the extent of this problem and to solicit comment as to whether regulator); action is necessary or appropriate. Such an inquiry could also further efforts to educate consumers regarding the problem. and to help publicize preventive steps.

We stand ready to work with the Commission on this important issue. Please contact us should you or your **staff** have any questions.

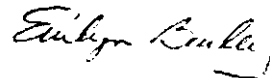
Respectfully submitted,



John Ramsey, Executive Director  
Association of Public-Safety Communications  
Officials-International, Inc.  
351 N. Williamson Blvd  
Daytona Beach, FL 32114



Mark Adams, Executive Director  
National Emergency Number Association  
P.O. Box 360960  
Columbus, OH 43236



Evelyn Bailey, President  
National Association of Nine One One  
Administrators  
Vermont Enhanced 9-1-1 Board  
94 State Street  
Drawer 20  
Montpelier, VT 05620-6501

cc: The Honorable Kathleen Abernathy  
The Honorable Michael Copps  
The Honorable Kevin Martin  
Thomas Sugrue, Chief, WTB

**National Emergency Number Association**

NENA • 422 Beecher Rd • Columbus Ohio 43230 • (800) 332-3911 • Fax (614) 933-0911  
www.nena9-1-1.org

**RECEIVED**

December 12, 2001

DEC - 6 2002

94-102

(TO: Wireless Carriers

Federal Communications Commission

CC: Wireless set manufacturers)

Office of the Secretary

**RE: THE WIRELESS UNINTENTIONAL 9-1-1 CALLS  
PROBLEM**

The National Emergency Number Association (NENA) is deeply concerned about the profound impact that unintentional 9-1-1 calling is having on America's ability to process legitimate 9-1-1 calls for help.

After studying the problem, we are proposing solutions that give carriers an opportunity to work cooperatively with public safety to try to solve the most visible and vexing problem facing 9-1-1 centers today.

It is an issue that can be embraced easily and visihly by carriers and public safety working together in the public interest. It is an issue where no side has to win to the detriment of the other.

**THE PROBLEM**

9-1-1 Public Safety Answering Points (PSAPs) report that from 25% to 70% of wireless calls to 9-1-1 are unintended calls by wireless subscribers. These are instances in which the wireless subscriber did not knowingly dial 9-1-1. This unacceptably high false alarm rate poses a major threat to the timely processing of legitimate calls for help. It also strains relationships between public safety and wireless carriers.

This problem is predominantly due to accidental activation of optional one-button autodialing features in wireless sets. These false 9-1-1 calls are not misdials.

These calls take up time on the limited number of inbound 9-1-1 circuits to PSAPs, lessening the ability of real, intended calls to 9-1-1 to reach calltakers. Unintended, accidental 9-1-1



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calls require time on the part of calltakers that today is in short supply. Over and above the life safety impact of false calls, it is a waste of public dollars and scarce human resources to stay on the line to ensure that people are not in trouble and to make callbacks to false callers.

These situations can also cause negative attitudes on the part of the caller toward their wireless carrier, as well as PSAP calltakers toward wireless carriers and their customers. Left unresolved, the volume of accidental calls and its drain on scarce public safety resources is spiraling in proportion to the growth of wireless itself.

In many cases, this well-intentioned but dangerous feature is pre-programmed by the manufacturer to dial 9-1-1 upon pressure on a single button (usually 1 or 9) for a short period of time, without user activation of the SEND function. Users carrying the set on belts, in pockets, or in purses then unknowingly press the pre-programmed button against some object, causing the false 9-1-1 call sequence.

#### ACTION ASKED OF CARRIERS AND MANUFACTURERS

NENA is asking wireless carriers, who have not already done so, to direct their wireless set manufacturers to change production procedures to remove or neutralize this feature as quickly as possible. Every week of delay results in the blocking or delay of legitimate calls for help in 911 call centers.

For equipment currently in distribution channels, staff at retail points of sale are asked to change activation procedures to:

1. Check the status of one-touch 911 dialing, setting it to OFF if the set is pre-programmed to be on.
2. Have point of sale personnel provide oral warning and a flyer to the buyer about the impact of false 9-1-1 calls if the customer chooses to activate the feature or chooses to program a speed-dial to dial 9-1-1.

To deal with the many wireless sets already in use, NENA is also requesting that carriers institute ongoing education through periodic customer information (bill or bill inserts, ads, etc.) to advise customers about the problem.

One very positive approach would be to document any 9-1-1 calls made on the customer bill, giving the customer the opportunity to recognize false calling to 9-1-1.

With the right language and tone, it represents **an** opportunity for everyone to take a bow for their efforts to make technology work for **us**, not against **us**.

**NENA** believes that the issue can be characterized positively and publicly as a joint cooperative effort by carriers, manufacturers and the public safety community to solve the number one obstacle to efficient **9-1-1** call processing in our nation today.

By this letter, **NENA** is asking for a commitment to voluntary action by carriers and manufacturers to remedy this problem. Responses from carriers and manufacturers to this proposed action plan will be summarized on the **NENA** web site.

**NENA** intends to continue monitoring the accidental call rate, with further definition of which manufacturers and models of wireless sets and which carriers' customers are generating accidental calls. These results will also be posted on **NENA's** website.

**As** public safety and the industry search for areas of agreement, **we** would like to believe that moving decisively in the aforementioned directions will take **us** one step closer to improving the public's safety through cooperative efforts.

Please respond on your status and/or actions to the address below.

Sincerely yours,

R. Hixson  
**NENA** Technical Issues Director